

**UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

FEDERAL TRADE COMMISSION  
and STATE OF GEORGIA,

Plaintiffs,

v.

LAPTOP & DESKTOP REPAIR, LLC,  
a Nevada limited liability company, also  
d/b/a cashforiphones.com,  
cashforlaptops.com, ecyclebest.com,  
smartphonetraders.com, sell-your-  
cell.com; and VADIM OLEGOVICH  
KRUCHININ, also a/k/a Vadim  
Kruchin, David Kruchin, David Vadim  
Kruchin, Dave Kruch, as the owner and  
an officer of Defendant Laptop &  
Desktop Repair, LLC,

Defendants.

Case No. 1:16-CV-3591-AT

**RECEIVER'S MOTION TO EXPAND THE RECEIVERSHIP**

**COMES NOW** Hays Financial Consulting LLC and S. Gregory Hays, (collectively the “Receiver”) and herewith moves this Court for an Order expanding the Receivership to include an entity named Coney Island 84 which may be either or both a corporation and a limited liability company, and any and all assets of that

or those entity(ies) including, but not limited to, real property, claims, causes of action, contract rights, leases, bank accounts and cash. In particular, the Receiver requests that the Receivership be expanded to include real estate located at 84 Coney Island Drive, Sparks, Nevada which is the Receivership Defendant's primary place of business, which was acquired by Coney Island 84 and which is where its assets and business records are currently housed (the "Coney Island Drive Building").

The Receiver was initially appointed on September 26, 2016, in the Temporary Restraining Order [ECF No. 9] entered in the above-captioned case. This Court appointed the Receiver for the business activities of the receivership defendant Laptop & Desktop Repair, LLC ("Receivership Defendant"). The Court reappointed the Receiver in the Stipulated Preliminary Injunction Order entered on October 5, 2016 [ECF No. 14.].

For the reasons more fully set forth in the "*Memorandum in Support of the Receiver's Motion to Expand the Receivership*" and the "*Declaration of S. Gregory Hays*" which are filed contemporaneously herewith and in support hereof, the expansion of the Receivership to include the entity named Coney Island 84 which may be either or both a corporation and a limited liability company, and any and all assets of that or those entity(ies) including, but not limited to the Coney Island Drive

Building, other real property, claims, causes of action, contract rights, leases, bank accounts and cash of Coney Island 84 is just and proper under the circumstances of this Case and necessary for the Receiver to discharge the duties and obligations assigned to him by this Court.

In addition to the Memorandum and Hays Declaration, this Motion is supported by all pleading and matters of record in this Case.

WHEREFORE, the Receiver respectfully requests that this Court enter an Order expanding the Receivership established in the Stipulated Preliminary Injunction Order to include the entity named Coney Island 84 which may be either or both a corporation and a limited liability company, and any and all assets of that or those entity(ies) including, but not limited to the Coney Island Drive Building, other real property, claims, causes of action, contract rights, leases, bank accounts and cash of Coney Island 84 and further requests such additional relief as may be just and proper.

Respectfully submitted this 3<sup>rd</sup> day of November, 2016.

LAW OFFICES OF HENRY F. SEWELL JR., LLC

/s/ Henry F. Sewell, Jr.

Henry F. Sewell, Jr.

Georgia Bar No. 636265

Counsel for the Receiver

Law Offices of Henry F. Sewell, Jr.

Suite 200, 3343 Peachtree Road NE

Atlanta, GA 30326

(404) 926-0053

[hsewell@sewellfirm.com](mailto:hsewell@sewellfirm.com)

**CERTIFICATE OF COMPLIANCE**

This is to certify that to the best of my knowledge this document has been prepared with one of the font and point selections approved by the Court in LR 5.1B, pursuant to LR 7. Specifically, the above-mentioned document has been prepared using Times New Roman font, 14 point.

This the 3<sup>rd</sup> day of November, 2016.

LAW OFFICES OF HENRY F. SEWELL JR., LLC

/s/ Henry F. Sewell, Jr.

Henry F. Sewell, Jr.

Georgia Bar No. 636265

Counsel for the Receiver

Law Offices of Henry F. Sewell, Jr.  
Suite 200, 3343 Peachtree Road NE  
Atlanta, GA 30326  
(404) 926-0053  
[hsewell@sewellfirm.com](mailto:hsewell@sewellfirm.com)

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
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**FEDERAL TRADE COMMISSION  
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**Plaintiffs.**

**v.**

**LAPTOP & DESKTOP REPAIR  
LLC,  
A Nevada Limited Liability  
Company, also  
d/b/a cashforiphones.com,  
cashforlaptops.com, ecyclebest.com,  
smartphonetraders.com, sell-your-  
cell.com; and VADIM OLEGOVICH  
KRUCHININ, also a/k/a Vadim  
Kruchinin, David Kruchinin, David  
Vadim Kruchinin, Dave Kruch, as the  
owner and an officer of Defendant  
Laptop & Desktop Repair, LLC,**

**Defendants**

**Civil Action File No:  
1:16-cv-3591-AT**

**CERTIFICATE OF SERVICE**

I hereby certify that on November 3, 2016, I electronically filed the *Receiver's Motion to Expand the Receivership, Memorandum in Support of Receiver's Motion to Expand the Receivership* and *Declaration of S. Gregory Hays* with the Clerk of the Court using

*CM/ECF*. I also certify that the foregoing document is being served on all parties and the persons identified below via transmission of Notice of Electronic Filing generated by *CM/ECF*, which will automatically send email notification of such filing to the counsel of record, or by causing it to be sent via First Class Mail where indicated below:

Anna Mirshak Burns  
Hans Christian Clausen  
Federal Trade Commission-ATL  
Atlanta Regional Office  
Suite 1500  
225 Peachtree Street, NE  
Atlanta, GA 30303-1729  
*Via ECF*

Anne Strom Infinger  
Arnall Golden & Gregory  
171 17th Street NW  
Suite 2100  
Atlanta, GA 30363  
*Via ECF*

Katherine Dorothy Schuessler  
Georgia Department of Corrections  
Legal Office  
2 Martin Luther King, Jr. Drive, S.E.  
Suite 870, East Tower  
Atlanta, GA 30334-4900  
*Via ECF*

Robert J. Angres, Esq.  
2650 Friesian Ct.  
Reno, NV 89521-6228  
*Via First Class Mail*

Vadim Kruchinin a/k/a David Kruchin  
5390 Vista Ridge Way  
Reno, NV 89523-1825  
*Via First Class Mail*

Coney Island 84, Inc.  
5390 Vista Ridge Way  
Reno, Nevada 89523  
*Via First Class Mail*

Ashley L.H. Krogh  
Officer and Litigation Manager, US Bank  
US Bancorp Center  
800 Nicollet Mall  
Minneapolis, MN 55402-7020  
Counsel for US Bank  
*Via First Class Mail*

Christopher Murray, Esq.  
Giuliano McDonnell & Perrone  
237 West 35<sup>th</sup> Street  
Suite 706  
New York, N.Y. 10001  
Counsel for LiftForward, Inc.  
*Via First Class Mail*

This the 3<sup>rd</sup> day of November, 2016.



LAW OFFICES OF HENRY F. SEWELL JR., LLC

/s/ Henry F. Sewell, Jr.

Henry F. Sewell, Jr.

Georgia Bar No. 636265

Counsel for the Receiver

Law Offices of Henry F. Sewell, Jr.

Suite 200, 3343 Peachtree Road NE

Atlanta, GA 30326

(404) 926-0053

[hsewell@sewellfirm.com](mailto:hsewell@sewellfirm.com)